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(additional counsel on Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**SECURITIES LEAD PLAINTIFF'S
EXHIBIT LIST FOR CONFIRMATION
HEARING**

Public Employees Retirement Association of New Mexico (“**Lead Plaintiff**”), the court-appointed lead plaintiff in the securities class action captioned as *In re PG&E Corporation Securities Litigation*, Case No. 18-03509 (the “**Securities Litigation**”) pending in the United States District Court for the Northern District of California (the “**District Court**”), on behalf of itself and the class that it seeks to represent in the Securities Litigation (the “**Class**”),¹ together with York County on behalf of the County of York Retirement Fund, City of Warren Police and Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension Fund (collectively with Lead Plaintiff the “**Securities Plaintiffs**”) hereby submit this Exhibit List (the “**Exhibit List**”) for the hearing to begin on May 27, 2020 at 10:00 am (prevailing Pacific Time) (the “**Confirmation Hearing**”) regarding confirmation of the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020* [ECF No. 6320] (the “**Plan**”) of the debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”), in support of Securities Plaintiffs’ objection to confirmation of the Plan (the “**Objection**”):

EXHIBITS

No.	Description
SP-001	Lead Plaintiff’s First Set of Document Demands to the Debtors in Connection with Confirmation of the Plan
SP-002	Email from Richard Slack to Randy Michelson, dated 5/14/2020 10:09 PM, re: Document Requests

¹ On February 27, 2019, the Court entered an order denying Securities Plaintiffs’ motion to apply Bankruptcy Rule 7023 to the claims Lead Plaintiff filed on behalf of the Class. Securities Plaintiffs timely appealed from that order and their appeal remains pending in the District Court. Nevertheless, the issues raised in this Objection apply equally to Securities Plaintiffs individually, who also timely filed individual proofs of claim in these Chapter 11 Cases and to the members of the Class. In addition, as the court-appointed lead plaintiff in the Securities Litigation, Lead Plaintiff remains a fiduciary for Class members. *See, e.g., Eubank v. Pella Corp.*, 753 F.3d 718, 723-24 (7th Cir. 2014) (“Class representatives are . . . fiduciaries of the class members. . . .”); *Schick v. Berg*, 2004 WL 856298, *4 (S.D.N.Y. Apr. 20, 2004) (“The general rule is that the named plaintiff and counsel bringing the action stand as fiduciaries for the entire class, commencing with the filing of a class complaint.”); *cf. In re Gen. Motors Corp. Pick-Up Truck Fuel Tank Prod. Liab. Litig.*, 55 F.3d 768, 801 (3d Cir. 1995) (“Beyond their ethical obligations to their clients, class attorneys, purporting to represent a class, also owe the entire class a fiduciary duty once the class complaint is filed.”).

RESERVATION OF RIGHTS

The Securities Plaintiffs reserve the right to (a) amend or supplement the foregoing Exhibit List at any time prior to the Confirmation Hearing; (b) use additional exhibits for purposes of rebuttal or impeachment; (c) rely upon and use as evidence (i) additional documents produced by any party, (ii) exhibits included on the exhibit list of any other party, and (iii) any pleading, hearing transcript, order, or other document filed with or by the Court in the Chapter 11 Cases; and/or (d) request that the Court take judicial notice of any pleadings, hearing transcripts, orders, or other documents filed in the Chapter 11 Cases, and/or the Securities Litigation.

Dated: May 18, 2020

Respectfully submitted,

**LOWENSTEIN SANDLER LLP
MICHELSON LAW GROUP**

By: /s/ Randy Michelson
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- and -

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- and -

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Counsel for the Securities Act Plaintiffs

- and -

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P.C.**

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Additional Counsel for the Securities Act Plaintiffs

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